

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

UNITED STATES OF AMERICA

V.

VICTOR GUILLERMO LIRA-AVALOS

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CASE NO. 1:22-CR-00267

**MOTION TO REVEAL AGREEMENTS BY THE GOVERNMENT
AND THEIR WITNESSES**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, VICTOR GUILLERMO LIRA-AVALOS, Defendant in the above-entitled and numbered cause, by and through his attorney of record and files this Motion To Reveal Agreements, and as grounds for such would respectfully show as follows:

I.

That there are other defendants indicted together in this cause and/or other informants who assisted and/or participated with law enforcement officers and the defendants in the investigation of this cause.

II.

That if the prosecution has either made, promised or implied that it will make concessions to either defendants/informers/or other witnesses in order to induce their testimony, the defense has the right to know the nature of the concessions to show bias, and such is vital to prove credibility.

III.

That if no such concessions have been made up to this time, that the prosecution be ordered to reveal such when and if it occurs.

WHEREFORE, PREMISES CONSIDERED, defendant prays that the court order the prosecution to reveal the exact nature of all negotiations and discussions with other defendants, witnesses, informants, or other persons concerning any promises, concessions, or expectations expressed or implied which could or might be expected to occur in the future in the event said people cooperate with the prosecution.

Respectfully submitted,
LAW OFFICE OF EDDIE LUCIO

/s/ Eddie Lucio
Eddie Lucio
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Attorney for Defendant

CERTIFICATE OF CONFERENCE

I, the undersigned, hereby certify that on April 22, 2022 I have conferred with the Assistant U.S. Attorney, David A. Lindenmuth, about this Motion to Reveal Agreements Between the Government and Their Witnesses.

/s/ Eddie Lucio
Eddie Lucio

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of April, 2022, a true and correct copy of the foregoing Motion to Reveal Agreements Between the Government and Their Witnesses was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties.

/s/ Eddie Lucio
Eddie Lucio